

# **EXHIBIT 19**



United States  
Attorney's Office  
Eastern District of New York



## PRESS RELEASE

# Congressman George Santos Charged With Conspiracy, Wire Fraud, False Statements, Falsification of Records, Aggravated Identity Theft, and Credit Card Fraud

Tuesday, October 10, 2023

### For Immediate Release

U.S. Attorney's Office, Eastern District of  
New York

## Santos Allegedly Filed Fraudulent Fundraising Reports with the FEC to Obtain Financial Support for His Campaign and Repeatedly Charged the Credit Cards of Campaign Contributors Without Authorization

CENTRAL ISLIP, NY – A 23-count superseding indictment was filed today in the United States District Court for the Eastern District of New York, charging George Anthony Devolder Santos, better known as “George Santos,” the United States Representative for the Third District of New York, with one count of conspiracy to commit offenses against the United States, two counts of wire fraud, two counts of making materially false statements to the Federal Election Commission (FEC), two counts of falsifying records submitted to obstruct the FEC, two counts of aggravated identity theft, and one count of access device fraud, in addition to the seven counts of wire fraud, three counts of money laundering, one count of theft of public funds, and

two counts of making materially false statements to the United States House of Representatives that were charged in the original indictment. Santos is due back in federal court in Central Islip on October 27, 2023.

Breon Peace, United States Attorney for the Eastern District of New York, Nicole M. Argentieri, Acting Assistant Attorney General of the Justice Department's Criminal Division, and James Smith, Assistant Director-in-Charge, Federal Bureau of Investigation, New York Field Office (FBI), and Anne T. Donnelly, Nassau County District Attorney, announced the superseding indictment.

"As alleged, Santos is charged with stealing people's identities and making charges on his own donors' credit cards without their authorization, lying to the FEC and, by extension, the public about the financial state of his campaign. Santos falsely inflated the campaign's reported receipts with non-existent loans and contributions that were either fabricated or stolen" stated United States Attorney Peace. "This Office will relentlessly pursue criminal charges against anyone who uses the electoral process as an opportunity to defraud the public and our government institutions."

"Santos allegedly led multiple additional fraudulent criminal schemes, lying to the American public in the process. The FBI is committed to upholding the laws of our electoral process. Anyone who attempts to violate the law as part of a political campaign will face punishment in the criminal justice system," stated FBI Assistant Director-in-Charge Smith.

"The defendant - a Congressman - allegedly stole the identities of family members and used the credit card information of political contributors to fraudulently inflate his campaign coffers," stated District Attorney Donnelly. "We thank our partners in the US Attorney's Office and the FBI as we work together to root out public corruption on Long Island."

As alleged in the superseding indictment, Santos, who was elected to Congress last November and sworn in as the U.S. Representative for New York's Third Congressional District on January 7, 2023, engaged in two fraudulent schemes, in addition to the multiple fraudulent schemes alleged in the original indictment.

### The Party Program Scheme

During the 2022 election cycle, Santos was a candidate for the United States House of Representatives in New York's Third Congressional District. Nancy Marks, who pleaded guilty on October 5, 2023 to related conduct, was the treasurer for his principal congressional campaign committee, Devolder-Santos for Congress. During this election cycle, Santos and Marks conspired with one another to devise and execute a fraudulent scheme to obtain money for the campaign by submitting materially false reports to the FEC on behalf of the campaign, in which they inflated the campaign's fundraising numbers for the purpose of misleading the FEC, a national party committee, and the public.

Specifically, the purpose of the scheme was to ensure that Santos and his campaign qualified for a program administered by the national party committee, pursuant to which the national party committee would provide financial and logistical support to Santos's campaign. To qualify for the program, Santos had to demonstrate, among other things, that his congressional campaign had raised at least \$250,000 from third-party contributors in a single quarter.

To create the public appearance that his campaign had met that financial benchmark and was otherwise financially viable, Santos and Marks agreed to falsely report to the FEC that at least 10 family members of Santos and Marks had made significant financial contributions to the campaign, when Santos and Marks both knew that these individuals had neither made the reported contributions nor given authorization for their personal information to be included in such false public reports. In addition, understanding that the national party committee relied on FEC fundraising data to evaluate candidates' qualification for the program, Santos and Marks agreed to falsely report to the FEC that Santos had loaned the campaign significant sums of money, when, in fact, Santos had not made the reported loans and, at the time the loans were reported, did not have the funds necessary to make such loans. These false reported loans included a \$500,000 loan, when Santos had less than \$8,000 in his personal and business bank accounts.

Through the execution of this scheme, Santos and Marks ensured that Santos met the necessary financial benchmarks to qualify for the program administered by the national party committee. As a result of qualifying for the program, the congressional campaign received financial support.

### The Credit Card Fraud Scheme

In addition, between approximately December 2021 and August 2022, Santos devised and executed a fraudulent scheme to steal the personal identity and financial information of contributors to his campaign. He then charged contributors' credit cards repeatedly, without their authorization. Because of these unauthorized transactions, funds were transferred to Santos's campaign, to the campaigns of other candidates for elected office, and to his own bank account. To conceal the true source of these funds and to circumvent campaign contribution limits, Santos falsely represented that some of the campaign contributions were made by other persons, such as his relatives or associates, rather than the true cardholders. Santos did not have authorization to use their names in this way.

For example, in December 2021, one contributor (the "Contributor") texted Santos and others to make a contribution to his campaign, providing billing information for two credit cards. In the days after he received the billing information, Santos used the credit card information to make numerous contributions to his campaign and affiliated political committees in amounts exceeding applicable contribution limits, without the Contributor's knowledge or authorization.

To mask the true source of these contributions and thereby circumvent the applicable campaign contribution limits, Santos falsely identified the contributor for one of the charges as one of his relatives. In the following months, Santos repeatedly charged the Contributor's credit card without the Contributor's knowledge or authorization, attempting to make at least \$44,800 in charges and repeatedly concealing the true source of funds by falsely listing the source of funds as Santos himself, his relatives and other contributors. On one occasion, Santos charged \$12,000 to the Contributor's credit card, ultimately transferring the vast majority of that money into his personal bank account.

The charges in the superseding indictment are allegations, and the defendants are presumed innocent unless and until proven guilty beyond a reasonable doubt in a court of law.

The government's case is being handled by the Office's Public Integrity Section, the Long Island Criminal Division, and the Justice Department Criminal Division's Public Integrity Section. Assistant United States Attorneys Ryan Harris, Anthony Bagnuola, and Laura Zuckerwise, along with Trial Attorneys Jacob Steiner and John Taddei, are in charge of the prosecution with assistance from Paralegal Specialist Rachel Friedman. Former Trial Attorney Jolee Porter of the Criminal Division's Public Integrity Section also provided substantial contributions to the prosecution.

### **The Defendant:**

GEORGE ANTHONY DEVOLDER SANTOS

Age: 35

Washington, District of Columbia

E.D.N.Y. Docket No. 23-CR-197 (JS)

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